

AARON D. FORD
Attorney General
ADAM L. WOODRUM (Bar No. 10284)
Deputy Attorney General
State of Nevada
Office of the Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
Phone: (775) 684-1159
Fax: (775) 684-1108
awoodrum@ag.nv.gov
Attorneys for Respondent

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PAUL SANTIAGO,

Petitioner,

vs.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No. 2:21-cv-00896-APG-NJK

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO
FILE REPLY TO PETITIONER'S
OPPOSITION TO MOTION TO
DISMISS
(ECF NOS. 67, 73)
(FIRST REQUEST)**

Respondents move this Court for an enlargement of time of 45 days from the current due date of June 1, 2023, up to and including July 16, 2023, in which to reply to Petitioner Paul Santiago's Opposition to Respondent's Motion to Dismiss Second Amended Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2254 (ECF No. 27). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the first enlargement of time sought by Respondents to file a reply, and the request is brought in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED this 26th day of May, 2023.

AARON D. FORD
Attorney General

By: /s/ Adam L. Woodrum
ADAM L. WOODRUM (Bar. No. 10284)
Deputy Attorney General

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DECLARATION OF ADAM L. WOODRUM

STATE OF NEVADA)
) ss:
 COUNTY OF CLARK)

I, ADAM L. WOODRUM, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Paul Santiago v. Calvin Johnson, et al.*, Case No. 2:21-cv-00896-APG-NJK, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The current deadline to reply to Santiago's response to Respondent's motion to dismiss is June 1, 2023.

4. I will not be able to timely complete the reply due to the short deadline along with my other workload. I assumed responsibility for this matter on March 13, 2023 and therefore did not draft the motion to dismiss, so I will require additional time to review the record and prior pleadings. Furthermore, I have a Ninth Circuit answering brief due on June 8, 2023 in *Melendez v. Nevin*, No. 21-

1 17135 for which two continuances have already been sought, as well as an answer due in *Skenandore v.*
2 *Russell*, No. 3:21-cv-00330-ART-CSD on June 5, 2023, for which two extensions have already been
3 sought.

4 8. I contacted counsel for Santiago and there is no opposition to this request.

5 9. For the foregoing reasons, I respectfully request an enlargement of time of 45 days, up to
6 and including July 16, 2023, in which to file my reply.

7 Executed on May 26, 2023.

8 /s/ Adam L. Woodrum

9 Adam L. Woodrum (Bar No. 10284)

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14 **ORDER**

15 IT IS SO ORDERED.

16 Dated this 26th day of May, 2023.

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18 DISTRICT COURT JUDGE
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